

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FELIX ESPOSITO AND  
ACCESS WITH SUCCESS, INC.,  
Plaintiffs

v.

29 HANCOCK STREET LLC; and  
ADAMS INN FACILITIES, INC.,  
Defendants

CIVIL ACTION NO. 05-10349-WGY

**DEFENDANTS' SECOND ASSENTED-TO MOTION TO EXTEND TIME  
FOR FILING RESPONSIVE PLEADING**

The defendants 29 Hancock Street LLC, and Adams Inn Facilities, Inc., move that the time within which they shall file a responsive pleading to this ADA action be extended to and including June 30, 2005.

This additional time will be used for the following purposes:

- To permit the plaintiffs and 29 Hancock Street LLC and Adams Inn Facilities, Inc., to arrange a walk-through of the handicapped-accessible rooms in question, and prepare their reports on compliance with the Americans with Disabilities Act. A walk-through of the other areas of the facility occurred on April 18, 2005, but the handicapped-accessible rooms were occupied at the time, so not available for examination by the plaintiffs' expert. The plaintiffs and 29 Hancock

Street LLC and Adams Inn Facilities, Inc., intend to discuss settlement prospects, based upon the results of the walk-throughs.

- To allow 29 Hancock Street LLC and Adams Inn Facilities, Inc., to determine whether they have insurance coverage of plaintiffs' claims.

Finally, 29 Hancock LLC and Adams Inn Facilities, Inc., agree not to file dispositive motions during the extension period.

WHEREFORE, for the good cause shown, the parties request an extension until June 30, 2005 to file a response to the Amended Complaint in this matter.

29 HANCOCK STREET LLC  
ADAMS INN FACILITIES, INC.  
By their attorneys,

s/Michael R. Coppock  
Michael R. Coppock, BBO #098840  
Rubin and Rudman LLP  
50 Rowes Wharf  
Boston, MA 02110  
(617) 330-7000

ASSENTED TO:

s/Nicholas S. Guerrero  
Nicholas S. Guerrero, BBO #551475  
Shaheen, Guerrero & O'Leary, LLC  
Counsel for the Plaintiffs  
Jefferson Office Park  
820A Turnpike Street  
North Andover, MA 01845  
(978) 689-0800